

THE HONORABLE TANA LIN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

NICOLE TOKARSKI, on behalf of herself  
and all others similarly situated,

Plaintiff,

v.

MED-DATA, INC.,

Defendant.

NO. 2:21-cv-00631-TL

**STIPULATED MOTION AND  
~~[PROPOSED]~~ ORDER TO AMEND  
CASE SCHEDULE**

**NOTED FOR CONSIDERATION:  
January 10, 2023**

**I. STIPULATION**

The current deadline for Plaintiff to file her motion for class certification is January 11, 2023. Dkt. No. 93. For the good cause explained below, the Parties respectfully request that the Court extend Plaintiff's deadline to file her motion for class certification to February 15, 2023 (35 days from January 11, 2022) and adjust all related response dates for the motion for class certification and other case deadlines to account for the 35-day adjustment.

The Local Rules allow parties to file stipulated motions, including to request relief from a deadline. LCR 7(d)(1); LCR 10(g) (providing that stipulated motions to alter schedules previously set by the court should be supported by reasons justifying the proposed change); *Doe v. Trump*, No. 2:17-CV-00178-JLR, 2017 WL 1378504, at \*1 (W.D. Wash. Apr. 11, 2017).

The parties have continued their combined and coordinated discovery efforts in each of the related pending matters, including this matter and the case pending in federal court in Texas and a

state matter in Kansas. On January 3, 2023, third party Crowe LLP provided a supplemental production pursuant to subpoena of over 2,000 pages of documents. Defendant has also continued to produce documents, having produced an additional 4,000-page production on December 21, 2022. The parties' experts also continue their work as part of the ongoing discovery review process.

Plaintiff requires a small amount of additional time to finalize her motion for class certification and is seeking—with agreement of Defendant—an additional 35 days. Extending the current deadlines will allow the parties to review recently provided discovery and resolve any disputes without undue haste and to continue to coordinate the related cases to avoid duplication and wasted resources. For these reasons, there is good cause to extend the deadline for a motion for class certification.

Accordingly, the Parties agree and stipulate, subject to the Court's approval, to an extension as follows:

EVENT	CURRENT DEADLINE	NEW DEADLINE
Deadline for Plaintiff to File Motion for Class Certification	January 11, 2023	February 15, 2023
Deadline for Defendant to File Response on Motion for Class Certification	February 10, 2023	March 17, 2023
Deadline for Plaintiff to File Reply on Motion for Class Certification	March 3, 2023	April 7, 2023
Discovery Deadline	45 days after Court's ruling on Class Certification	45 days after Court's ruling on Class Certification
Deadline for filing Dispositive Motions	75 days after Court's ruling on Class Certification	75 days after Court's ruling on Class Certification

STIPULATED TO AND DATED this 10th day of January, 2023.

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**II. ORDER**

Based on the forgoing parties' stipulation and for good cause, it is hereby ORDERED that the current deadlines regarding class certification briefing are EXTENDED by 35 days as set forth in the accompanying motion.

Dated this 10th day of January 2023.

  
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Tana Lin  
United States District Judge